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8 (*Pro Hav Vice Motion Pending*)
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14 **Attorneys for Defendant**

15 **UNITED STATES DISTRICT COURT**
16 **FOR THE DISTRICT OF NEVADA**

17 Donna Brower,

18 Plaintiff,

19 v.

20 McDonald's Corp., a Foreign Corporation
21 licensed to do business in Nevada,

22 Defendant.

Case No.: 2:19-cv-02099-GMN-BNW

23 **DEFENDANT'S MOTION FOR**
24 **EXTENSION OF TIME TO FILE**
25 **CORRECTED VERIFIED PETITION**
26 **(First Request)**

27 Defendant McDonald's Corp. ("Defendant" or "McDonald's"), through its undersigned attorneys
28 and pursuant to Fed. R. Civ. P. 6(b)(1)(A), LR IA 6-1 and LR 7-2. hereby moves the Court for an extension
of time for Defendant to file its Corrected Verified Petition pursuant to the Court's December 27, 2019
Minute Order (ECF No. 13), by ten (10) days, from January 7, 2020 to January 17, 2020. Defendant bases
this motion on the pleadings and papers on file herein together with the following memorandum of points
and authorities. This is the first request by Defendant to extend time to file its Corrected Verified Petition.

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. BACKGROUND**

3 On December 23, 2019, Defendant filed its Verified Petition for Permission to Practice *Pro*
4 *Hac Vice* by Stacey A. Campbell (“Petitioner”) and Designation of Local Counsel Dustin L. Clark (ECF
5 No. 12). On December 27, 2019, the Court deferred its ruling on Defendant’s Verified Petition, and
6 ordered that Petitioner has until January 7, 2020 to correct its Petition by attaching a certification of good
7 standing from each state bar or from the clerk of the supreme court or highest admitting court of each
8 state that the Mr. Campbell has been admitted to practice law. (See ECF No. 12).

9 Petitioner has requested certificates of good standing from the other states where Mr. Campbell
10 is licensed, including: Arizona, Kansas, Missouri, Utah and Wyoming. These certificates will be
11 delivered to Petitioner by mail.

12 **II. ARGUMENT**

13 Federal Rule of Civil Procedure 6(b)(1) governs extension of time and provides that “the court
14 may, for good cause, extend the time... if a request is made, before the original time or its extension
15 expires.” In light of the holidays, Petitioner has been unable to obtain all of the required certificates of
16 good standing to comply with the currently set deadline of January 7, 2020. To reduce client costs and
17 in the exercise of judicial economy, good cause exists for the Court to extend the deadline to correct the
18 Verified Petition by ten (10) days, from January 7, 2020 to January 17, 2020, to allow sufficient time
19 for Petitioner to receive the respective certificates of good standing from the States of Arizona, Kansas,
20 Missouri, Utah and Wyoming.

21 For these reasons and in good faith, Defendant respectfully requests that the Court grant its
22 motion for a ten (10) day extension of time, up to and including January 17, 2020, to file a Corrected
23 Verified Petition for Stacey A. Campbell to appear *pro hac vice*.

24 Dated: January 6, 2020.

Respectfully submitted,

25 /s/ Dustin Clark

26 Dustin Clark, Esq. (#10548)

27 Holley, Driggs, Walch,

28 Fine, Puzey, Stein & Thompson

1 Stacey A. Campbell, (Colo. Bar #38378)
2 (Pro Hav Vice Motion Pending)
3 Campbell Litigation, P.C.
4 730 17th St., Suite 730

Attorneys for Defendant McDonald's Corp.

5 **ORDER**

6 **IT IS SO ORDERED** that Defendant's Motion for Extension of Time to File Corrected Verified
7 Petition is **GRANTED**. Defendant shall file its Corrected Verified Petition **no later than January 17,**
8 **2020.**

9 **DATED** this 8 day of January, 2020.

10 
11 _____
12 Gloria M. Navarro, District Judge
13 United States District Court

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on January 6, 2020, I caused a true and correct copy of the foregoing
16 **MOTION FOR EXTENSION OF TIME TO FILE CORRECTED VERIFIED PETITION (First**
17 **Request)** to be electronically filed with the Clerk of the Court using the CM/ECF System which sent
18 notification of such filing to the following counsel of record:

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Attorneys for Plaintiff

25 /s/ Sandy Sell

26 An Employee of Holley Driggs Walch Fine Puzey
27 Stein & Thompson
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